

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, State Bar Number 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendant
19 FIDELITY NATIONAL TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

22 Gary L. Compton, State Bar No. 1652
23 2950 E. Flamingo Road, Suite L
24 Las Vegas, Nevada 89121

25 **UNITED STATES DISTRICT COURT**

26 **DISTRICT OF NEVADA**

27 HSBC BANK USA, N.A.,

28 Case No.: 2:20-CV-01515-JAD-BNW

Plaintiff,

**STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO
OPPOSITIONS TO MOTIONS TO
DISMISS AND COUNTERMOTION
FOR PARTIAL SUMMARY
JUDGMENT (ECF Nos. 32, 33, 35, 36)**

29 vs.

30 FIDELITY NATIONAL TITLE GROUP,
31 INC. et al.,

32 Defendants. **(FIRST REQUEST)** ECF No. 39

33 COMES NOW defendant Fidelity National Title Insurance Company (“Fidelity”) and
34 plaintiff HSBC Bank USA, N.A. (“HSBC”), by and through their respective attorneys of record,
35 hereby agree and stipulate as follows:

36 1. On September 15, 2020, Fidelity and fellow defendants Fidelity National Title
37 Group Inc. (“FNTG”) and Fidelity National Title Agency of Nevada, Inc. (“Fidelity Agency”)

1 filed their motions to dismiss (ECF Nos. 11, 12, 13.);

2 2. On November 30, 2020, HSBC filed its responses to Fidelity, FNTG, and Fidelity
3 Agency's motions to dismiss (ECF Nos. 32, 33, 35) and filed a countermotion for partial
4 summary judgment (ECF No. 36);

5 3. Fidelity, FNTG, and Fidelity Agency's deadline to respond to the oppositions to
6 the motions to dismiss and countermotion for partial summary judgment is currently December 7,
7 2020;

8 4. Fidelity, FNTG, and Fidelity Agency request a brief extension of time to respond
9 to the various motions, until December 21, 2020, to afford Fidelity, FNTG, and Fidelity Agency
10 additional time to respond to the legal arguments set forth in HSBC's motions;

11 5. HSBC does not oppose the requested extension;

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1 6. This is the first request for an extension which is made in good faith and not for
2 purposes of delay;

3 **IT IS SO STIPULATED** that Fidelity, FNTG, and Fidelity Agency's deadline to respond
4 to HSBC's oppositions to the motions to dismiss (ECF Nos. 32, 33, 35) and countermotion for
5 partial summary judgment (ECF No. 36) is hereby extended through and including December 21,
6 2020.

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8 Dated: December 1, 2020

SINCLAIR BRAUN LLP

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10 By: /s/-Kevin S. Sinclair
11 KEVIN S. SINCLAIR
12 Attorneys for Defendant
13 FIDELITY NATIONAL TITLE INSURANCE
14 COMPANY

15 Dated: December 1, 2020

WRIGHT FINLAY & ZAK, LLP

16 By: /s/-Darren T. Brenner
17 DARREN T. BRENNER
18 Attorneys for Plaintiff
19 HSBC BANK USA, N.A.

20 **IT IS SO ORDERED.**

21 Dated this 7th day of December, 2020.

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29 JENNIFER A. DORSEY
30 UNITED STATES DISTRICT JUDGE
